

RE: LACHON SMITH) Case No. 22 B 12180
)
)
) Chapter 13
Debtor(s))
) Judge: CAROL A DOYLE

NOTICE OF MOTION & CERTIFICATE OF SERVICE

LACHON SMITH
2145 E 98TH ST
CHICAGO, IL 60617

DAVID FREYDIN
via Clerk's ECF noticing procedures

Please take notice that on March 07, 2023 at 10:30 am., I will appear before the Honorable Judge Carol A Doyle or any judge sitting in the judge's place, **either** in Courtroom 742, Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, **or** electronically as described below, and present the motion of trustee to dismiss case for unreasonable delay, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 155 8289 and the passcode is Doyle742. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on February 10, 2023.

/s/ Thomas H. Hooper

Thomas H. Hooper, Trustee

Thomas H. Hooper
Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900

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MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Thomas H. Hooper, Trustee, and requests that this case be dismissed pursuant to 11 U.S.C. §1307(c)(1), and in support thereof respectfully states the following:

1. On October 20, 2022 the debtor(s) filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. A plan has not been confirmed in this case.
3. The debtor(s) has caused unreasonable delay that is prejudicial to creditors by failing to:
Failure to amend section 2.3 of the plan to add the trustee's tax turnover language.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this Court deems just and proper.

/s/ Thomas H. Hooper

Thomas H. Hooper
Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900

Thomas H. Hooper, Trustee